

May 15, 2006

Mr. Ravi N. Sanga
Remedial Project Manager
US Environmental Protection Agency
1200 Sixth Avenue, ECL-111
Seattle, Washington 98101

RE: T-117 Upland Draft Removal Action Plan
Terminal 117 Early Action Area
Lower Duwamish Waterway Superfund Site, Seattle, WA

Dear Mr. Sanga:

The Port of Seattle (Port) has prepared a new Draft T-117 Upland Removal Action Plan in response to your letter to the Port dated May 5, 2006. This Draft Removal Action Plan replaces the prior *T-117 Upland Site Draft Removal Action Technical Memorandum* dated April 4, 2006. Polychlorinated Biphenyls (PCBs) up to 9,200 parts per million were discovered in the 2006 soil investigation. Based on these very high concentrations, the Port is proposing a Time-Critical Removal Action (TCRA) at T-117 to mitigate the imminent risk in a timely manner. This TCRA is only the first phase of removal for the T-117 early Action Area. The second phase of removal at T-117 will be the bank and the sediments adjacent to the T-117 upland area or Non-Time Critical Removal Action (NTCRA). These two phases, when completed, will:

- Prevent or reduce the potential for human exposure to contaminants at levels that pose a risk on the upland property.
- Prevent or reduce the potential for migration of contaminants from entering the waterway at levels that may cause exceedances of the Sediments Management Standards (SMS) for chemicals of concern adjacent to the T-117 upland area.

This Removal Action Plan provides:

1. Description of the recommended upland removal action(s) for a Technical Memorandum as specified in US Environmental Protection Agency (EPA) Administrative Settlement Agreement and Order on Consent No. CERCLA 10-2006-0072 (Settlement Agreement) and
2. Documentation to support an application for a risk-based method for removal of PCB remediation wastes under *40CFR761.61 (c) Risk-based disposal approval*.

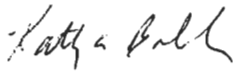
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Key changes to this Draft Removal Action Plan include:

- The proposed PCB soil action level of 25 parts per million (ppm) was developed using EPA's risk assessment guidance to support a risk-based method for removal of PCB remediation wastes under 40CFR761.61(c) *Risk-based disposal approval*. This risk-based method replaces the prior discussion of potential PCB cleanup levels under 40CFR761.61(a) *Self-implementing on-site cleanup and disposal of PCB remediation* in the Draft Technical Memorandum. The proposed action level of 25 ppm assumes industrial use but does not require occupancy restrictions.
- The proposed PCB soil action level of 25 ppm will apply across the entire T-117 upland area.
- An asphalt cap will be constructed across the upland area. In addition, soil with PCBs at or greater than 10 ppm in the upper two feet will be excavated and replaced with clean fill to provide additional protection in the event of cracks in the asphalt cap.
- Total Petroleum Hydrocarbons (TPH) at 4,000 ppm and oil with PCBs that may act to mobilize PCBs will be excavated in the upland area.
- Groundwater monitoring for PCBs, TPH, PAHs, and arsenic will be performed for 5 years to provide data on the groundwater to surface pathway and to monitor the effectiveness of the removal action
- A contingency plan coupled with the robust groundwater monitoring program will be implemented to address potential uncertainties with the proposed removal action.

Sincerely,



Kathy Bahnick
Manager, Remediation Services
Port of Seattle